

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SALEM HARBOR POWER
DEVELOPMENT LP (f/k/a Footprint Power
Salem Harbor Development LP), *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10239 (MFW)

(Jointly Administered)

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MAY 24, 2022 AT 3:00 P.M. (ET)**

ZOOM INSTRUCTIONS:

The remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing:

<https://debuscourts.zoomgov.com/meeting/register/vJlIceGtqi0qHgVb1I7D87xXBSZtgRopfHY>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

MATTER GOING FORWARD

1. Motion of Iberdrola Energy Projects Inc. for an Order Pursuant to Section 105(a) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2004, and Local Bankruptcy Rule 2004-1 Authorizing and Directing the Examination of the Debtors, Prepetition Officers, Managers, and Potential Transfer Recipients [[D.I. 175](#); 5/16/22]

Related Pleadings:

- a) Declaration of Richard W. Riley in Support of the Motion of Iberdrola Energy Projects Inc. for an Order Pursuant to Section 105(a) of the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Salem Harbor Power Development LP (f/k/a Footprint Power Salem Harbor Development LP) (1360); Highstar Salem Harbor Holdings GP, LLC (f/k/a Highstar Footprint Holdings GP, LLC) (2253); Highstar Salem Harbor Power Holdings L.P. (f/k/a Highstar Footprint Power Holdings L.P.) (9509); Salem Harbor Power FinCo GP, LLC (f/k/a Footprint Power Salem Harbor FinCo GP, LLC) (N/A); Salem Harbor Power FinCo, LP (f/k/a Footprint Power Salem Harbor FinCo, LP) (9219); and SH Power DevCo GP LLC (f/k/a Footprint Power SH DevCo GP LLC) (9008). The location of the Debtors' service address is: c/o Tateswood Energy Company, LLC, 480 Wildwood Forest Drive, Suite 475, Spring, Texas 77380.

² **Amended items appear in bold.**

Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2004, and Local Bankruptcy Rule 2004-1 Authorizing and Directing the Examination of the Debtors, Prepetition Officers, Managers, and Potential Transfer Recipients [[D.I. 176](#); 5/16/22]

- b) Order Granting Motion to Shorten Time for Notice of the Hearing on, and the Deadline to Respond to, Motion of Iberdrola Energy Projects Inc. for an Order Pursuant to Section 105(a) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2004, and Local Bankruptcy Rule 2004-1 Authorizing and Directing the Examination of the Debtors, Prepetition Officers, Managers, and Potential Transfer Recipients [[D.I. 179](#); 5/17/22]
- c) Notice of Hearing [[D.I. 180](#); 5/17/22]

Objection Deadline: May 23, 2022 at 12:00 p.m. (ET)

Objections/Informal Responses:

- d) **Debtors' Objection to the Motion of Iberdrola Energy Projects Inc. for an Order Pursuant to Section 105(a) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2004, and Local Bankruptcy Rule 2004-1 Authorizing and Directing the Examination of the Debtors, Prepetition Officers, Managers, and Potential Transfer Recipients [[D.I. 193](#); 5/23/22]**
- e) **[Sealed] Objection of Oaktree to the Motion of Iberdrola Energy Projects Inc. for an Order Pursuant to Section 105(a) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2004, and Local Bankruptcy Rule 2004-1 Authorizing and Directing the Examination of the Debtors, Prepetition Officers, Managers, and Potential Transfer Recipients [[D.I. 194](#); 5/23/22]**
- f) **Declaration of Andrew J. Ehrlich [[D.I. 195](#); 5/23/22]**
- g) **Declaration of Curtis Miller in Support of Objection of Oaktree to the Motion of Iberdrola Energy Projects Inc. for an Order Pursuant to Section 105(a) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2004, and Local Bankruptcy Rule 2004-1 Authorizing and Directing the Examination of the Debtors, Prepetition Officers, Managers, and Potential Transfer Recipients [[D.I. 196](#); 5/23/22]**

Status: This matter is going forward.

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Dated: May 23, 2022
Wilmington, Delaware

Respectfully submitted,

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Andrew L. Magaziner

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- and -

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